UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Case No. 16-cr-0484(34)

v.

CHAVIA SAVAGE, et al.

FILED UNDER SEAL

MOTION TO SEAL

Defendant, Chavia Savage, by her undersigned counsel and pursuant to Local Rule 105.11, moves to seal her Consent Sealing Motion including exhibits, and this Motion to Seal. The grounds for this Motion are as follows:

- 1. The charges against Ms. Savage were dismissed pursuant to a Deferred Prosecution Agreement by Order dated February 8, 2019.
- 2. Ms. Savage now moves to seal or redact certain court records related to the dismissed charges as fully set forth in the accompanying Consent Sealing Motion and the specific relief requested in the proposed sealing order.
- 3. Assistant U.S. Attorney Leo Wise has indicated that the government does not oppose this motion.

WHEREFORE, Ms. Savage respectfully requests that the Court seal her Consent Sealing Motion and exhibits, and this Motion to Seal.

Dated: December 23, 2020 Respectfully submitted,

/s/ Adam B. Abelson

Gregg L. Bernstein (Bar No. 01340)

Adam B. Abelson (Bar No. 29532)

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Zuckerman Spaeder LLP 100 East Pratt Street, Suite 2440 Baltimore, Maryland 21202 (410) 949-1144 (telephone) (410) 659-0436 (facsimile) gbernstein@zuckerman.com aabelson@zuckerman.com

Counsel for Defendant, Chavia Savage Case 1:16-cr-00484-DKC Document 1522 Filed 12/23/20 Page 3 of 3

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 2014, copies of the foregoing Motion to

Seal and Proposed Order (filed under seal) were sent by e-mail and regular mail to: Leo J. Wise,

Assistant United States Attorney, Office of the United States Attorney, 36 South Charles Street,

Fourth Floor, Baltimore, Maryland 21201; lwise@usa.doj.gov.

/s/ Adam B. Abelson

Adam B. Abelson